

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

KEENAN T. KNIGHT

PLAINTIFF

CASE NO. 23-CV-886

AMIKA AVERY,

JORDAN TAYLOR,

TERRELL WILLIAMS

PETITION TO FILE AMENDED REPLY TO DEFENDANT'S
PROPOSED FINDINGS OF FACT

NOW COMES THE PLAINTIFF KEENAN T. KNIGHT, PRO SE, RESPECTFULLY
REQUESTING THIS COURT TO ALLOW PLAINTIFF A REASONABLE
AMOUNT OF TIME TO FILE AN AMENDED REPLY TO DEFENDANT'S
PROPOSED FINDING OF FACT IN GOOD FAITH AS RESPONSE TO
DEFENDANT'S OBJECTIONS TO CURE SAID OBJECTIONS OF
DEFENDANTS TO PLAINTIFF RESPONSE TO THEIR PROPOSED FINDING OF FACT

1. ON 8/1/2024, DEFENDANT'S FILED THEIR MOTION FOR SUMMARY JUDGMENT, INCLUDING PROPOSED FINDINGS OF FACT AND SUPPORTING MEMORANDUM OF LAW, AND DECLARATIONS
2. ON 11/8/2024, PLAINTIFF FILED A RESPONSE TO DEFENDANT'S SUMMARY JUDGMENT, INCLUDING PLAINTIFF'S DECLARATION, RESPONSE TO DEFENDANT'S PROPOSED FINDINGS OF FACT, AND SUPPORTING MEMORANDUM OF LAW, AND DECLARATIONS

3. ON 11/22/2024, DEFENDANTS FILED A REPLY IN SUPPORT OF DEFENDANTS PROPOSED FINDING OF FACT OBJECTING TO A GREAT MAJORITY OF PLAINTIFF REPLY MAINLY BASED ON PROCEDURAL ERRORS OF FED. R. CIV. P. 56(C)(1)(A) AND CIV. L. R. 56(b)(2)(B)(i)

4. ON 12/1/2024, PLAINTIFF RECEIVED LEGAL MAIL THROUGH GREEN BAY INSTITUTION MAIL ROOM FORMALLY INFORMING PLAINTIFFS OF DEFENDANTS SAID OBJECTION

5. PLAINTIFF IS RESPECTFULLY REQUESTING THAT IN GOOD FAITH THIS COURT GRANT PLAINTIFF A REASONABLE AMOUNT OF TIME TO FILE A AMENDED RESPONSE TO DEFENDANTS PROPOSED FINDING OF FACT TO CURE SAID OBJECTIONS OF PROCEDURAL ERRORS

Dated December 3, 2024

Respectfully,
Deean J Knight